REMARKS

By the present amendment, Applicants have amended the specification to correct minor errors, and have amended claims 1, 8, 10, 11, and 19. No new matter has been added. In the Final Office Action mailed September 7, 2007, the Examiner rejected claims 8 and 10[1] under 35 U.S.C. § 101 for allegedly being directed to non-statutory subject matter, and rejected claims 1-8 and 10-23 under 35 U.S.C. § 102(e) for allegedly being anticipated by U.S. Patent No. 6,771,291, to DiStefano, III ("DiStefano"). Applicants respectfully traverse these rejections.

I.   Rejection Under 35 U.S.C. § 101

Applicants respectfully traverse the Examiner's rejection. The Examiner states, "[c]laims 8-10 are directed to a computer implemented method of calculation," such that "[t]he claimed invention does not result in a physical transformation. The inputs are numbers and the outputs are also numbers." Office Action at pages 2-3. However, claim 8 does not recite a method of calculation, but rather recites a system comprising "a first set of stored database tables," "a first set of stored transactions," "a second set of stored database tables," and "means for generating web pages." Thus, independent claim 8 and dependent claim 10 recite stored information and means for generating web pages based on the stored information. Claims 8 and 10 are therefore directed toward statutory subject matter, and the rejection of claims 8 and 10 under 35 U.S.C. § 101 should be withdrawn.

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[1] The Final Office Action, on page 2, states that claims 8-10 are rejected under 35 U.S.C. § 101. Because claim 9 was canceled in a previous amendment, Applicants assume that only claims 8 and 10 are rejected under 35 U.S.C. § 101.

II.   Rejections Under 35 U.S.C. § 102(e) in View of DiStefano

Applicants respectfully traverse the rejection of claims 1-8 and 10-23 under

35 U.S.C. § 102(e) as anticipated by DiStefano. In order to properly establish that

DiStefano anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and

every element of each of the claims in issue must be found, either expressly described

or under principles of inherency, in that single reference. Furthermore, "[t]he identical

invention must be shown in as complete detail as is contained in the ... claim." *See*

M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236,

9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989). DiStefano does not anticipate the claims at

least because it fails to teach each and every recitation of the claims.

For example, claim 1 recites a system including, *inter alia*:

> means for enabling a user to create a web page layout by:
> . . .
>   defining interaction between at least two of the selected GUI
> components, the interaction including causing a first GUI component to perform
> an action in response to an event generated by a second GUI component, and
>   defining interaction between one or more of the GUI components
> and the web application program, the interaction involving business data and one
> or more backend systems;

DiStefano does not disclose the recited "means for enabling."

The Examiner asserts that column 7, lines 25-34 of DiStefano discloses "defining

interaction between at least two of the selected GUI components, the interaction

including causing a first GUI component to perform an action in response to an event

generated by a second GUI component." *See* Office Action at 4. Applicants

respectfully disagree. This cited portion of DiStefano merely discloses that a user "can

apply selected web assets, sound elements, or color elements to existing web assets or

other elements." (column 7, lines 30-31). As such, DiStefano does not disclose or suggest defining interaction between the selected web components, "the interaction including causing a first GUI component to perform an action in response to an event generated by a second GUI component," as recited in claim 1.

Furthermore, the Examiner asserts that column 11, lines 40-43, and column 12, lines 35-38 of DiStefano disclose "defining interaction between one or more of the GUI components and the web application program, the interaction involving business data and one or more backend systems." See Office Action at 4. Applicants respectfully disagree. Column 11, lines 40-43 of DiStefano merely disclose that "the GUI of system 100 is also capable of adding tables and cells to the website being designed." This addition of tables does not disclose an "interaction including business data and one or more backend systems," as recited in claim 1. Column 12, lines 35-38 of DiStefano disclose that a user log in menu includes "fields for the potential customer's (i.e., prospective registered user's) name, address, e-mail address, telephone number, interests, hobbies and businesses." This portion of DiStefano merely describes fields that can be filled in by a user logging in to a website design program. It does not teach or suggest, "means for enabling a user to create a web page layout by. . . defining interaction between one or more of the selected GUI components and the web application program, the interaction involving business data and one or more backend systems," as recited in claim 1.

For at least these reasons, DiStefano fails to disclose each and every recitation of claim 1, and the rejection of claim 1 under 35 U.S.C. § 102(e) in view of DiStefano should be withdrawn. Independent claims 11 and 19, though of different scope from

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claim 1, also recite "defining interaction between at least two of the selected GUI

components, the interaction including causing a first GUI component to perform an

action in response to an event generated by a second GUI component" and "defining

interaction between one or more of the selected GUI components and the web

application program, the interaction involving business data and one or more backend

systems." Therefore, DiStefano does not anticipate claims 11 and 19 for at least the

same reasons presented above. Claims 2-7, 12-18, and 20-23 depend from claims 1,

11, and 19, respectively, and include all of the recitations of their respective parent

claims. Accordingly, for at least the same reasons discussed above in connection with

claim 1, DiStefano does not anticipate dependent claims 2-7, 12-18, and 20-23. As

such, the rejections of claims 2-7 and 11-23 under 35 U.S.C. § 102(e) should be

withdrawn.

Independent claim 8 recites a system including, *inter alia*:

> a first set of stored database tables to define screens, including one or
> more tables that describe graphical user interface (GUI) screen components,
> screen layout, component configuration, application model assignment, and
> event handling;
> ...
> a second set of stored database tables based upon the first set of stored
> database tables, the second set of stored database tables configured for
> customization and personalization of the user interface.

DiStefano fails to disclose these recitations. The "first set of database tables"

recited in claim 8 includes "tables that describe graphical user interface (GUI) screen

components, screen layout, component configuration, application model assignment,

and event handling." DiStefano, however, merely teaches a list of "web assets, sound

elements, and color elements," that may be used to design a web site. *See, e.g.,*

column 7, lines 21-34. As such, DiStefano does not disclose "tables that describe graphical user interface (GUI) screen components, screen layout, component configuration, application model assignment, and event handling," as recited in claim 8.[2] Furthermore, because DiStefano does not disclose "a first set of stored database tables to define screens," DiStefano also fails to disclose "a second set of stored database tables based upon the first set of stored database tables," as recited in claim 8. Accordingly, DiStefano does not teach or suggest "a first set of database tables to define screens, including one or more tables that describe graphical user interface (GUI) screen components, screen layout, component configuration, application model assignment, and event handling" and "a second set of database tables based upon the first set of database tables, the second set of database tables being used for customization and personalization of the user interface," as recited in claim 8.

Therefore, DiStefano fails to disclose each and every recitation of claim 8, and the rejection of claim 8 under 35 U.S.C. § 102(e) should be withdrawn. Claim 10 depends from claim 8 and, therefore, the rejection of claim 10 under 35 U.S.C. § 102(e) should also be withdrawn for at least the same reasons discussed above.

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[2] The Examiner asserts that "paragraph 0010" of DiStefano discloses the recited first set of database tables. Office Action at 6. However, DiStefano does not include numbered paragraphs. Thus, it does not appear that the Examiner addressed the recited "first set of database tables."

CONCLUSION

In view of the foregoing, the pending claims are neither anticipated nor rendered obvious in view of the prior art references cited against this application. Applicants, therefore, request the Examiner's reconsideration of the application, and the timely allowance of pending claims 1-8 and 10-23.

The Office Action contains characterizations of the claims and the related art with which Applicants do not necessarily agree. Unless expressly noted otherwise, Applicants decline to subscribe to any statement or characterization in the final Office Action.

If a telephone interview will expedite issuance of this application, the Examiner is requested to call Applicants' representative whose name and registration number appear below at (202) 408-4138, to discuss any remaining issues.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: December 7, 2007

By: _Bradley Edelman_

Bradley Edelman
Reg. No. 57,648